

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:51 PM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Joe: You already have all the bank accounts in question.

The extension for the forbearance agreement is still being negotiated and has not yet been signed.

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From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
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To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
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Sent: Monday, June 24, 2019 1:12 PM

To: Nicholas LaRocca <nlarocca@laroccalaw.com>

Subject: Re: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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Khurram Shah

Cell: +1 571 431 9572

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<nlarocca@laroccalaw.com<mailto:nlarocca@laroccalaw.com>>

Sent: Monday, June 24, 2019 9:02 PM

To: Khurram Shah

Subject: FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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Cc: Jeff Leleux <jleleux@swiftships.com<mailto:jleleux@swiftships.com>>;  
Shehrazee Shah <sshah@swiftships.com<mailto:sshah@swiftships.com>>  
Subject: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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Also enclosed is M&T account for Swift.

Kind Regards,  
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President/CEO  
[signature\_1400267714]

Cell: 571-431-9572  
Fax: 703-356-1166

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✓  
c Nicholas LaRocca

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**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 4:28 PM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Spurgeon v. Swift Group LCC, et al

Ok Joe. Just forwarded you email to Khurram

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From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 26, 2019 3:23 PM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon v. Swift Group LCC, et al

Nick,

Thank you. Assuming Swiftships has no other checking accounts, I believe I have what I requested on Swiftships checking accounts.

I have no recent checking info on ICS Nett. Please confirm that PNC account 53-356-9272 is its current account and it has no other operating or payroll accounts.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
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Subject: FW: Spurgeon v. Swift Group LCC, et al

From: Nicholas LaRocca  
Sent: Wednesday, June 26, 2019 2:44 PM  
To: Maria G. Izaguirre <assistant@laroccalaw.com>  
Subject: FW: Spurgeon v. Swift Group LCC, et al

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Nick. See the enclosed, this was already provided to you last week. Compare the enclosed with the account number you sent - 53-0361-8759. Attached are the same. These are Swiftships operating and payroll account.



◁ Khurram Shah  
Cell: +1 571 431 9572

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From: Khurram Shah <kshah@sunraysint.com<mailto:kshah@sunraysint.com>>  
Sent: Friday, June 14, 2019 1:35 AM  
To: Nicholas LaRocca; Jeff LeLeux  
Subject: Re: Spurgeon v. Swift Group LCC, et al

CURRENT - PNC Bank Statements for both ICS and Swift accounts.  
What else ?

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President/CEO  
[signature\_530998089]

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Date: Wednesday, June 12, 2019 at 3:35 PM  
To: Khurram Shah <kshah@sunraysint.com<mailto:kshah@sunraysint.com>>, Jeff LeLeux  
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Subject: Fwd: Spurgeon v. Swift Group LCC, et al

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Date: June 12, 2019 at 1:37:52 PM CDT  
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Sent: Thursday, June 6, 2019 3:19 PM  
To: 'nlarocca\_laroccalaw.com<http://nlarocca\_laroccalaw.com>'<nlarocca@laroccalaw.com<mailto:nlarocca@laroccalaw.com>>  
Subject: Spurgeon v. Swift Group LCC, et al

Nick,

Please provide the current bank statements for all judgment creditors asap.  
That should be an easy get for your clients. Also, I need the current contracts we discussed.

Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com<mailto:jward@wardandcondrey.com>

**Nicholas LaRocca**

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To my knowledge the document has not been signed. I believe that what I sent you was the current and maybe the final draft. The last communication with counsel for Summit was a discussion of who would sign for Shipbuilders. Jeff will sign for Shipbuilders in his capacity as administrator of the succession of Calvin. Whether or not Jeff has actually signed the document is uncertain. However, I will forward this letter to my client to determine whether in fact there is a fully executed extension.

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**Attachments:** SKMBT\_C36019061317350[1].pdf

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**Subject:** Spurgeon v. Swift Group LCC, et al

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Please provide the current bank statements for all judgment creditors asap. That should be an easy get for your clients. Also, I need the current contracts we discussed.

Thanks.

Joe

Joseph R. Ward, Jr.

Ward & Condrey

438 S. New Hampshire Street

Covington, LA 70433

Telephone: (985) 871-5223

Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:44 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: Nicholas LaRocca  
Sent: Monday, June 24, 2019 3:23 PM  
To: jward@wardandcondrey.com  
Subject: RE: Spurgeon

Ok. We will contact the Government and see if we can get the statements.

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Monday, June 24, 2019 3:06 PM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon

I need every account that holds funds for any judgment debtor. I intend to issue garnishments on all accounts that are active.

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From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 24, 2019 2:36 PM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

Joe: I can try to secure the controlled disbursement accounts. Do you want them?

Maria G. Izaguirre

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**Sent:** Wednesday, June 26, 2019 2:44 PM  
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**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Monday, June 24, 2019 3:09 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** Re: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Let me check. I gave you what

Khurram Shah  
Cell: +1 571 431 9572

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**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Monday, June 24, 2019 10:32 PM  
**To:** Khurram Shah  
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Cc: Jeff Leleux <jleleux@swiftships.com<mailto:jleleux@swiftships.com>>;  
Shehrazee Shah <sshah@swiftships.com<mailto:sshah@swiftships.com>>

Subject: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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Kind Regards,  
Khurram Shah  
President/CEO  
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Fax: 703-356-1166

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At the time that is all we had. I will get the statements from Jan-present asap.

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Cell: +1 571 431 9572

---

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Monday, June 24, 2019 9:02 PM  
**To:** Khurram Shah  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Can you get copies of the bank accounts for operating, payroll and any other current accounts, if any?

-----Original Message-----

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Monday, June 24, 2019 12:59 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** RE: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Nick,

I'm looking for the all present accounts (operating, payroll and any other current account) for Swiftship entities. I don't see those.

Joe

-----Original Message-----

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Monday, June 24, 2019 12:42 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:01 PM

To: Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>

Cc: Jeff Leleux <[jleleux@swiftships.com](mailto:jleleux@swiftships.com)>; Shehrazee Shah <[sshah@swiftships.com](mailto:sshah@swiftships.com)>

Subject: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Nick.

We were interested in provided only open accounts to Joe, but since you are asking for more, here's bank statements for WHITNEY BANK, but the account is closed.

Also enclosed is M&T account for Swift.

Kind Regards,

Khurram Shah

President/CEO

[signature\_1400267714]

Cell: 571-431-9572

Fax: 703-356-1166

This e-mail and any file(s) attached to it may contain confidential and/or privileged information and is intended exclusively for the designated recipient(s). Any other use of this e-mail is prohibited. Sunrays does not represent or warrant that this communication is free of computer viruses or other defects and does not accept liability for any loss or damage caused by this email. If you have received this message in error, please notify the sender immediately by reply email message and delete all copies and attachment



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:43 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

-----Original Message-----

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 1:03 PM  
**To:** Khurram Shah (kshah@sunraysint.com) <kshah@sunraysint.com>  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Can you get copies of the bank accounts for operating, payroll and any other current accounts, if any?

-----Original Message-----

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
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**Subject:** RE: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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**Sent:** Monday, June 24, 2019 12:42 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:01 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>; Shehraz Shah <sshah@swiftships.com>  
**Subject:** WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Nick.

We were interested in provided only open accounts to Joe, but since you are asking for more, here's bank statements for WHITNEY BANK, but the account is closed.

Also enclosed is M&T account for Swift.

Kind Regards,  
Khurram Shah  
President/CEO

[signature\_1400267714]

Cell: 571-431-9572

Fax: 703-356-1166

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Maria G. Izaguirre

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**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:43 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

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**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
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Joe

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**Sent:** Monday, June 24, 2019 12:42 PM  
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**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:01 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>; Shehraz Shah <sshah@swiftships.com>  
**Subject:** WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Nick.

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Kind Regards,  
Khurram Shah  
President/CEO  
[signature\_1400267714]

Cell: 571-431-9572  
Fax: 703-356-1166

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damage caused by this email. If you have received this message in error, please notify the sender immediately by reply email message and delete all copies and attachment

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:43 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon  
**Attachments:** Fixed Assets Schedule \_SS\_Q1 FY19.xlsx; Swiftships Tangible Assets\_2019.xlsx

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:42 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** Spurgeon

Joe:

I thought you may be interested in these financials too.

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:43 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS  
**Attachments:** 2017 - Whitney Bank - Swiftships LLC - Account#110083428 - Operating.pdf; 2017 - Whitney Bank - Swiftships LLC - Account#110083439 - Payroll.pdf; 2018 - Whitney Bank - Swiftships LLC - Account#110083428 - Operating.pdf; 2018 - Whitney Bank - Swiftships LLC - Account#110083439 - Payroll.pdf; 2015 - M & T Bank - Swiftships LLC - Account# 9856160461 - Operating - upto June 2015.pdf; 2015 - M & T Bank - Swiftships LLC - Account# 9864092177 - Operating.pdf; 2016 - M & T Bank - Swiftships LLC - Account# 9864092177 - Operating - upto July 2016.pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:42 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:01 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>; Shehrazee Shah <sshah@swiftships.com>  
**Subject:** WHITNEY ACCOUNT FOR SWIFT -- CLOSED BANK ACCOUNTS

Nick.

We were interested in provided only open accounts to Joe, but since you are asking for more, here's bank statements for WHITNEY BANK, but the account is closed.

Also enclosed is M&T account for Swift.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:42 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: ICS Bank Accounts - CLOSED 2/2  
**Attachments:** FY2017\_ICS Nett\_Whitney-8168[3].pdf; FY2018\_ICS Nett\_Whitney-8168[3].pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:41 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: ICS Bank Accounts - CLOSED 2/2

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:10 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>; Shehrazee Shah <sshah@ics-nett.com>  
**Subject:** ICS Bank Accounts - CLOSED 2/2

Email – 2/2

Nick,  
Here is an ICS accounts this is CLOSED NOW

1. WHITNEY

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:42 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: ICS Bank Accounts - CLOSED 1/2  
**Attachments:** Archive 2.zip

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:40 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: ICS Bank Accounts - CLOSED 1/2

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Sunday, June 23, 2019 5:12 PM  
**To:** Nicholas LaRocca <nlarocca@larocca.com>  
**Cc:** Shehraz Shah <sshah@ics-nett.com>; Jeff Leleux <jleleux@swiftships.com>  
**Subject:** ICS Bank Accounts - CLOSED 1/2

Email 1/2

Nick,  
Here is an ICS's accounts that is CLOSED NOW

1. M&T

Kind Regards,

**Khurram Shah**  
President/CEO




Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:40 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Contract for Bahrain  
**Attachments:**  FOB\_BDF\_Swiftships 35m FPV Contract\_Navy2007\_Signed.pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:38 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: Contract for Bahrain

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Monday, June 24, 2019 11:19 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>  
**Subject:** Contract for Bahrain

Signed contract for Bahrain – this concludes all contract.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:40 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Personnel Bank Statements - Shehraz Shah  
**Attachments:** 05-31-2019.pdf; 01-31-2019.pdf; 02-28-2019.pdf; 03-29-2019.pdf; 04-30-2019.pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 12:38 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: Personnel Bank Statements - Shehraz Shah

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Monday, June 24, 2019 7:53 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Shehraz Shah <sshah@ics-nett.com>  
**Subject:** Personnel Bank Statements - Shehraz Shah

Nick – see Shehraz's personnel statements from this year. This is the only account he has.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Personnel Bank Statements - Shehraz Shah  
**Attachments:** 05-31-2019.pdf; 01-31-2019.pdf; 02-28-2019.pdf; 03-29-2019.pdf; 04-30-2019.pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 24, 2019 7:54 AM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: Personnel Bank Statements - Shehraz Shah

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Monday, June 24, 2019 7:53 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Shehraz Shah <sshah@ics-nett.com>  
**Subject:** Personnel Bank Statements - Shehraz Shah

Nick – see Shehraz's personnel statements from this year. This is the only account he has.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Calvin's testimony

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Friday, June 21, 2019 1:02 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** RE: Calvin's testimony

Guess that's why we have a judge.

I think we have a way out for everyone presuming Swiftships intends to pay off Summit by July 31. Spurgeon can agree to a payout shortly thereafter but with an assignment of all the mortgages held by Summit as collateral. So he's assured he will get paid. Summit's attorney thinks it might work if all parties agree but he has no authority to agree to anything at this time.

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Friday, June 21, 2019 12:42 PM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Calvin's testimony

Yes. I guess we are making different inferences regarding this testimony.

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Friday, June 21, 2019 12:02 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** Calvin's testimony

Nick,

Received your reply brief. You did read page ROA 1121 (trans. pg. 197)?

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

Maria G. Izaguirre

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**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
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Maria G. Izaguirre

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Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon v. Swift Group

**From:** Nicholas LaRocca  
**Sent:** Friday, June 21, 2019 7:38 AM  
**To:** jward@wardandcondrey.com  
**Subject:** Re: Spurgeon v. Swift Group

Cannot sign affidavit until I get you the last item. Monday

Sent from my iPhone

On Jun 20, 2019, at 10:52 AM, "jward@wardandcondrey.com" <jward@wardandcondrey.com> wrote:

Nick,

And to make sure the record is clear, we offered to allow a response by affidavit.

Joe

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, June 14, 2019 1:02 PM  
**To:** nlarocca@laroccalaw.com  
**Cc:** Joseph Ward <jward@wardandcondrey.com>; Carol <clanasa@wardandcondrey.com>; assistant@laroccalaw.com  
**Subject:** Spurgeon v. Swift Group

Nick,

See attached Notice of JD Exam by deposition. If all the information is provided prior to the deposition, by affidavit signed duly sworn by the defendants, then I will cancel the depo. Otherwise, I expect all defendants or their representative to appear.

Time is of the essence so we will object to any extension.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 jward@wardandcondrey.com

<Notice of Judgment Debtor Exam by Deposition.docx>

<Untitled attachment 00094.htm>

<EXHIBIT A.doc>

<Untitled attachment 00097.htm>

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon v. Swift Group  
**Attachments:** Notice of Judgment Debtor Exam by Deposition.docx; Untitled attachment 00094.htm; EXHIBIT A.doc; Untitled attachment 00097.htm

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Thursday, June 20, 2019 10:35 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** FW: Spurgeon v. Swift Group

Nick,

And to make sure the record is clear, we offered to allow a response by affidavit.

Joe

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, June 14, 2019 1:02 PM  
**To:** nlarocca@laroccalaw.com  
**Cc:** Joseph Ward <jward@wardandcondrey.com>; Carol <clanasa@wardandcondrey.com>; assistant@laroccalaw.com  
**Subject:** Spurgeon v. Swift Group

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See attached Notice of JD Exam by deposition. If all the information is provided prior to the deposition, by affidavit signed duly sworn by the defendants, then I will cancel the depo. Otherwise, I expect all defendants or their representative to appear.

Time is of the essence so we will object to any extension.

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Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Thursday, June 20, 2019 10:17 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Nick,

I didn't receive any response when I sent the notice last week. They are already in contempt for blowing off the judge's April order anyway. I was just trying to give them a chance to redeem themselves.

And look, I know it not you. But I just don't think they take this seriously.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Thursday, June 20, 2019 10:08 AM  
To: jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

This date was not cleared for me or my clients. Shehrazee is in Saudi and Jeff is in Egypt.

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Thursday, June 20, 2019 10:06 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Nick,

I am going forward with the scheduled judgment debtor deposition tomorrow.  
If no one shows, I will conduct a process verbal.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

-----Original Message-----

From: Kim Comeaux <kim@psrdocs.com>  
Sent: Thursday, June 20, 2019 9:47 AM  
To: 'Carol LaNasa' <clanasa@wardandcondrey.com>  
Cc: 'Joseph Ward' <jrwardjr@gmail.com>; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Thank you, I will mark it as being confirmed

Kim Comeaux  
reporters@psrdocs.com  
Professional Shorthand Reporters, Inc.  
Ph 504-529-5255

-----Original Message-----

From: Carol LaNasa [mailto:clanasa@wardandcondrey.com]  
Sent: Thursday, June 20, 2019 9:35 AM  
To: 'Kim Comeaux'  
Cc: Joseph Ward; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Kim:

Yes, this deposition is going forward tomorrow, June 21, 2019, at 10:00 a.m. at the Southern Hotel, "Josie" Room, in Covington, LA.

Thank you,

Carol  
Ward & Condrey, LLC

-----Original Message-----

From: Kim Comeaux [mailto:kim@psrdocs.com]  
Sent: Thursday, June 20, 2019 8:28 AM  
To: jward@wardandcondrey.com; clanasa@wardandcondrey.com  
Subject: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

See attachment showing details for your job scheduled on 06/21/2019, in the matter of Dennis R. Spurgeon vs Swift Group, LLC, et al for 10:00 AM.

Please review and reply to let us know if this job is going forward and also to notify us of any changes.

(The 10:00PM ending time is just a system default.)

Thank you,  
Professional Shorthand Reporters, Inc.

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

-----Original Message-----

From: Nicholas LaRocca  
Sent: Thursday, June 20, 2019 10:08 AM  
To: jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

This date was not cleared for me or my clients. Shehrazee is in Saudi and Jeff is in Egypt.

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Thursday, June 20, 2019 10:06 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Nick,

I am going forward with the scheduled judgment debtor deposition tomorrow.  
If no one shows, I will conduct a process verbal.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

-----Original Message-----

From: Kim Comeaux <kim@psrdocs.com>  
Sent: Thursday, June 20, 2019 9:47 AM  
To: 'Carol LaNasa' <clanasa@wardandcondrey.com>  
Cc: 'Joseph Ward' <jrwardjr@gmail.com>; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Thank you, I will mark it as being confirmed

Kim Comeaux  
reporters@psrdocs.com  
Professional Shorthand Reporters, Inc.

Ph 504-529-5255

-----Original Message-----

From: Carol LaNasa [mailto:clanasa@wardandcondrey.com]  
Sent: Thursday, June 20, 2019 9:35 AM  
To: 'Kim Comeaux'  
Cc: Joseph Ward; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Kim:

Yes, this deposition is going forward tomorrow, June 21, 2019, at 10:00 a.m. at the Southern Hotel, "Josie" Room, in Covington, LA.

Thank you,

Carol  
Ward & Condrey, LLC

-----Original Message-----

From: Kim Comeaux [mailto:kim@psrdocs.com]  
Sent: Thursday, June 20, 2019 8:28 AM  
To: jward@wardandcondrey.com; clanasa@wardandcondrey.com  
Subject: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

See attachment showing details for your job scheduled on 06/21/2019, in the matter of Dennis R. Spurgeon vs Swift Group, LLC, et al for 10:00 AM.

Please review and reply to let us know if this job is going forward and also to notify us of any changes.

(The 10:00PM ending time is just a system default.)

Thank you,  
Professional Shorthand Reporters, Inc.  
Ph 504-529-5255



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:39 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Thursday, June 20, 2019 10:06 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Nick,

I am going forward with the scheduled judgment debtor deposition tomorrow.  
If no one shows, I will conduct a process verbal.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

-----Original Message-----

From: Kim Comeaux <kim@psrdocs.com>  
Sent: Thursday, June 20, 2019 9:47 AM  
To: 'Carol LaNasa' <clanasa@wardandcondrey.com>  
Cc: 'Joseph Ward' <jrwardjr@gmail.com>; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Thank you, I will mark it as being confirmed

Kim Comeaux  
reporters@psrdocs.com  
Professional Shorthand Reporters, Inc.  
Ph 504-529-5255

-----Original Message-----

From: Carol LaNasa [mailto:clanasa@wardandcondrey.com]  
Sent: Thursday, June 20, 2019 9:35 AM  
To: 'Kim Comeaux'

Cc: Joseph Ward; jward@wardandcondrey.com  
Subject: RE: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

Kim:

Yes, this deposition is going forward tomorrow, June 21, 2019, at 10:00 a.m. at the Southern Hotel, "Josie" Room, in Covington, LA.

Thank you,

Carol  
Ward & Condrey, LLC

-----Original Message-----

From: Kim Comeaux [mailto:kim@psrdocs.com]  
Sent: Thursday, June 20, 2019 8:28 AM  
To: jward@wardandcondrey.com; clanasa@wardandcondrey.com  
Subject: Confirmation of Scheduling from Professional Shorthand Reporters, Inc. - PLEASE RESPOND

See attachment showing details for your job scheduled on 06/21/2019, in the matter of Dennis R. Spurgeon vs Swift Group, LLC, et al for 10:00 AM.

Please review and reply to let us know if this job is going forward and also to notify us of any changes.

(The 10:00PM ending time is just a system default.)

Thank you,  
Professional Shorthand Reporters, Inc.  
Ph 504-529-5255

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:38 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: ICS Contracts  
**Attachments:** fbi itsc - to 4.zip; wmata - smartrip.zip

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 19, 2019 12:02 PM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** FW: ICS Contracts

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Monday, June 17, 2019 10:37 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** Jeff Leleux <jleleux@swiftships.com>  
**Subject:** ICS Contracts

ICS active contracts.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 19, 2019 9:33 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon

Nick,

Just checked the produced documents and can confirm that I have no bank statements from any defendant for 2019.

I have older statements from M & T Bank for Swiftships LLC but only through 3/31/15; Some old FNBC statements with no company name; Whitney statements for ICS Nett through 12/31/18; PNC Bank statements through 12/31/18 for ICS Nett; PNC Bank statements for Swiftships LLC through 12/31/18.

I don't have any other statements. Certainly no current statements from anyone. I have nothing for the other defendants, including Shah. I have nothing for the new account that was supposed to be opened at Investar Bank. The defendants were order to product current bank statements some time ago.

I have been above board with everyone advising that I intend to issue garnishments to these banks. I need the updated documentation as I don't want to waste a bank's time and money (and mine) garnishing an old account.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Wednesday, June 19, 2019 8:39 AM  
To: jward@wardandcondrey.com  
Cc: 'Jeff LeLeux' <jleleux@swiftships.com>  
Subject: RE: Spurgeon

I am relaying your message to Jeff to get some help in opening the docs.

The landing craft project contract has not been signed.

What bank statements are you missing?

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 19, 2019 8:37 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Spurgeon

Nick,

I can't open any document forwarded that has a .\_ at the beginning of the doc name.

Also, I think I'm still missing all bank account info on all judgment debtors. And I didn't receive the landing craft contract but it may be in the docs that I couldn't open.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>

Sent: Monday, June 17, 2019 11:15 AM

To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>

Subject: Spurgeon

ICS active contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 19, 2019 8:53 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon

Nick,

17 docs provided can't be opened.

I have no bank statements for 2019.

I need the latest bank statement for any bank account owned by any judgement debtor. That should take about 15 minutes.

I expect someone to appear on Friday to testify about the request under oath. I think your clients are playing me, you and the judge.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Wednesday, June 19, 2019 8:39 AM  
To: jward@wardandcondrey.com  
Cc: 'Jeff LeLeux' <jleleux@swiftships.com>  
Subject: RE: Spurgeon

I am relaying your message to Jeff to get some help in opening the docs.

The landing craft project contract has not been signed.

What bank statements are you missing?

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 19, 2019 8:37 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Spurgeon

Nick,

I can't open any document forwarded that has a .\_ at the beginning of the doc name.

Also, I think I'm still missing all bank account info on all judgment debtors. And I didn't receive the landing craft contract but it may be in the docs that I couldn't open.

Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 17, 2019 11:15 AM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

ICS active contracts



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: Jeff Leleux <jleleux@swiftships.com>  
Sent: Wednesday, June 19, 2019 8:40 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: Re: Spurgeon

I'll have to review the docs when I get to my room on my laptop

Jeff LeLeux  
President  
Swiftships LLC  
(O) 985-380-2519  
(M) 985-519-5529

> On Jun 19, 2019, at 3:38 PM, Nicholas LaRocca <nlarocca@laroccalaw.com> wrote:

>

>

>

> -----Original Message-----

> From: jward@wardandcondrey.com <jward@wardandcondrey.com>

> Sent: Wednesday, June 19, 2019 8:37 AM

> To: Nicholas LaRocca <nlarocca@laroccalaw.com>

> Subject: FW: Spurgeon

>

> Nick,

>

> I can't open any document forwarded that has a . \_ at the beginning of the doc name.

>

> Also, I think I'm still missing all bank account info on all judgment debtors. And I didn't receive the landing craft contract but it may be in the docs that I couldn't open.

>

> Joe

>

> -----Original Message-----

> From: Nicholas LaRocca <nlarocca@laroccalaw.com>

> Sent: Monday, June 17, 2019 11:15 AM

> To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>

> Subject: Spurgeon

>

> ICS active contracts

> <winmail.dat>


--

\*Think Green! Please consider the environment before printing this e-mail.\*


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Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon  
**Attachments:**  .FBI ITSC TO 4\_Award Letter.pdf; .J-FBI-13-179 BPA\_FBI ITSC TO4\_Award\_1.23.14 -FE.pdf; .WO 1 TO 4.pdf; .WO 10 TO 04 03 23 16 -FE.pdf; .WO 11. fe.pdf; .WO 12R-Expect.pdf; .WO 12R-fe.pdf; .WO 12R1-fe.pdf; .WO 13 TO 4.pdf; .WO 1A1-fe.pdf; .WO 2 TO 4-fe.pdf; .WO 3-R1-fe.pdf; .WO 4-fe.pdf; .WO 5.signed.pdf; .WO 6 TO 4 -fe.pdf; .WO 7 TO 4 1 final.pdf; .WO 8 TO 4-fe.pdf; .WO 9 TO 4\_12 29 15 fe.pdf; .XPECT.FBI ITSC.SubK.01.06.2014.3\_FE.pdf

-----Original Message-----

 **From:** Nicholas LaRocca  
**Sent:** Wednesday, June 19, 2019 8:39 AM  
**To:** 'Jeff LeLeux' <jleleux@swiftships.com>  
**Subject:** FW: Spurgeon

-----Original Message-----

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Wednesday, June 19, 2019 8:37 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** FW: Spurgeon

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-----Original Message-----

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Monday, June 17, 2019 11:15 AM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** Spurgeon

ICS active contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

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Sent: Wednesday, June 19, 2019 8:39 AM  
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Sent: Wednesday, June 19, 2019 8:37 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
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-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 17, 2019 11:15 AM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

ICS active contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon  
**Attachments:** \_FBI ITSC TO 4\_Award Letter.pdf; \_J-FBI-13-179 BPA\_FBI ITSC TO4\_Award\_1.23.14 -FE.pdf; \_WO 1 TO 4.pdf; \_WO 10 TO 04 03 23 16 -FE.pdf; \_WO 11. fe.pdf; \_WO 12R-Expect.pdf; \_WO 12R-fe.pdf; \_WO 12R1-fe.pdf; \_WO 13 TO 4.pdf; \_WO 1A1-fe.pdf; \_WO 2 TO 4-fe.pdf; \_WO 3-R1-fe.pdf; \_WO 4-fe.pdf; \_WO 5.signed.pdf; \_WO 6 TO 4 -fe.pdf; \_WO 7 TO 4 1 final.pdf; \_WO 8 TO 4-fe.pdf; \_WO 9 TO 4\_12 29 15 fe.pdf; \_XPECT.FBI ITSC.SubK.01.06.2014.3\_FE.pdf

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Wednesday, June 19, 2019 8:37 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: FW: Spurgeon

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Joe

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 17, 2019 11:15 AM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

ICS active contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:35 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Tuesday, June 18, 2019 11:49 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon

Can't open this attachment either.

Looks like any attachment that has a \_ underline at the beginning can't be opened.

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 17, 2019 11:16 AM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

More ICS contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:34 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon

-----Original Message-----

From: jward@wardandcondrey.com <jward@wardandcondrey.com>  
Sent: Tuesday, June 18, 2019 11:46 AM  
To: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Subject: RE: Spurgeon

Nick, for some reason I can't open these attachments.

-----Original Message-----

From: Nicholas LaRocca <nlarocca@laroccalaw.com>  
Sent: Monday, June 17, 2019 11:15 AM  
To: '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
Subject: Spurgeon

ICS active contracts



Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:34 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon  
**Attachments:** ATT30095.\_Modifications; .\_.Notice of Award - Acceptance -3-14-14.pdf; ATT07900.\_POs

**From:** Nicholas LaRocca  
**Sent:** Monday, June 17, 2019 11:16 AM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** Spurgeon

More ICS contracts

Maria G. Izaguirre

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 26, 2019 2:34 PM  
**To:** Maria G. Izaguirre  
**Subject:** FW: Spurgeon  
**Attachments:** \_FBI ITSC TO 4\_Award Letter.pdf; \_J-FBI-13-179 BPA\_FBI ITSC TO4\_Award\_1.23.14 -FE.pdf; \_WO 1 TO 4.pdf; \_WO 10 TO 04 03 23 16 -FE.pdf; \_WO 11. fe.pdf; \_WO 12R-Expect.pdf; \_WO 12R-fe.pdf; \_WO 12R1-fe.pdf; \_WO 13 TO 4.pdf; \_WO 1A1-fe.pdf; \_WO 2 TO 4-fe.pdf; \_WO 3-R1-fe.pdf; \_WO 4-fe.pdf; \_WO 5.signed.pdf; \_WO 6 TO 4 -fe.pdf; \_WO 7 TO 4 1 final.pdf; \_WO 8 TO 4-fe.pdf; \_WO 9 TO 4\_12 29 15 fe.pdf; \_XPECT.FBI ITSC.SubK.01.06.2014.3\_FE.pdf

**From:** Nicholas LaRocca  
**Sent:** Monday, June 17, 2019 11:15 AM  
**To:** '(Joe) Joseph Ward Jr.' <jward@wardandcondrey.com>  
**Subject:** Spurgeon

ICS active contracts

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Monday, June 17, 2019 10:46 AM  
**To:** '(Joe) Joseph Ward Jr.'  
**Subject:** Spurgeon - Swiftships, LLC active contracts  
**Attachments:** Contract - Egypt 28M Kit FMS (FE).pdf; P00001 Attachment J-1 28m CPC Production Kit List dated 30 June 2017.pdf; P00001\_N00024-16-C-2233 -FE.pdf; P00002\_N00024-16-C-2233\_Swiftships, LLC\_Egypt 28M Kit -FE.pdf; Terms Modification - Inspection and Acceptance.pdf; A00001 - CAGE Code Change.pdf; A00003 - J-2 Amendment.pdf

**Nicholas LaRocca**

---

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, June 14, 2019 1:02 PM  
**To:** Nicholas LaRocca  
**Cc:** Joseph Ward; Carol; Maria G. Izaguirre  
**Subject:** Spurgeon v. Swift Group  
**Attachments:** Notice of Judgment Debtor Exam by Deposition.docx; EXHIBIT A.doc

Nick,

See attached Notice of JD Exam by deposition. If all the information is provided prior to the deposition, by affidavit signed duly sworn by the defendants, then I will cancel the depo. Otherwise, I expect all defendants or their representative to appear.

Time is of the essence so we will object to any extension.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Friday, June 14, 2019 8:19 AM  
**To:** (Joe) Joseph Ward Jr.  
**Subject:** Fwd: Spurgeon v. Swift Group LCC, et al  
**Attachments:** SKMBT\_C36019061317350[1].pdf; ATT00001.htm; SKMBT\_C36019061317360.pdf; ATT00002.htm

Sent from my iPhone

Begin forwarded message:

**From:** "Khurram Shah" <kshah@sunraysint.com>  
**To:** "Nicholas LaRocca" <nlarocca@laroccalaw.com>, "Jeff LeLeux" <jleleux@swiftships.com>  
**Subject:** Re: Spurgeon v. Swift Group LCC, et al

CURRENT - PNC Bank Statements for both ICS and Swift accounts.  
What else ?

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

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**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Date:** Wednesday, June 12, 2019 at 3:35 PM  
**To:** Khurram Shah <kshah@sunraysint.com>, Jeff LeLeux <jleleux@swiftships.com>  
**Subject:** Fwd: Spurgeon v. Swift Group LCC, et al

Sent from my iPhone

Begin forwarded message:

**From:** "jward@wardandcondrey.com" <jward@wardandcondrey.com>

**Date:** June 12, 2019 at 1:37:52 PM CDT

**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>

**Subject:** FW: Spurgeon v. Swift Group LCC, et al

Nick,

Its been a week and no word. Please provide the requested documents or I will have no alternative but to seek a contempt order against the defendants.

Joe

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>

**Sent:** Thursday, June 6, 2019 3:19 PM

**To:** 'nlarocca@laroccalaw.com' <nlarocca@laroccalaw.com>

**Subject:** Spurgeon v. Swift Group LCC, et al

Nick,

Please provide the current bank statements for all judgment creditors asap. That should be an easy get for your clients. Also, I need the current contracts we discussed.

Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Friday, June 14, 2019 6:27 AM  
**To:** 'lawdml\_hanna orders'  
**Cc:** 'Carol LaNasa'; Nicholas LaRocca  
**Subject:** Spurgeon v. Swift Group, LLC, et al 11-01807  
**Attachments:** MOTION TO IMPOSE SANCTIONS (Motion).pdf; MOTION TO IMPOSE SANCTIONS (Memo).pdf; MOTION TO IMPOSE SANCTIONS (Order).pdf; MOTION TO IMPOSE SANCTIONS (Motion).doc; MOTION TO IMPOSE SANCTIONS (Memo).doc; MOTION TO IMPOSE SANCTIONS (Order).doc

Dear Judge Hanna,

Attached please find a copy of our Motion for Sanctions, Memorandum in Support and proposed Order in PDF and Word format.

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com



## Nicholas LaRocca

---

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Thursday, June 13, 2019 5:35 PM  
**To:** Nicholas LaRocca; Jeff LeLeux  
**Subject:** Re: Spurgeon v. Swift Group LCC, et al  
**Attachments:** SKMBT\_C36019061317350[1].pdf; SKMBT\_C36019061317360.pdf

CURRENT - PNC Bank Statements for both ICS and Swift accounts.  
What else ?

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

This e-mail and any file(s) attached to it may contain confidential and/or privileged information and is intended exclusively for the designated recipient(s). Any other use of this e-mail is prohibited. Sunrays does not represent or warrant that this communication is free of computer viruses or other defects and does not accept liability for any loss or damage caused by this email. If you have received this message in error, please notify the sender immediately by reply email message and delete all copies and attachment

---

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Date:** Wednesday, June 12, 2019 at 3:35 PM  
**To:** Khurram Shah <kshah@sunraysint.com>, Jeff LeLeux <jleleux@swiftships.com>  
**Subject:** Fwd: Spurgeon v. Swift Group LCC, et al

Sent from my iPhone

Begin forwarded message:

**From:** "jward@wardandcondrey.com" <jward@wardandcondrey.com>  
**Date:** June 12, 2019 at 1:37:52 PM CDT  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** FW: Spurgeon v. Swift Group LCC, et al

Nick,

Its been a week and no word. Please provide the requested documents or I will have no alternative but to seek a contempt order against the defendants.

Joe

**From:** [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com) <[jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)>  
**Sent:** Thursday, June 6, 2019 3:19 PM  
**To:** 'nlarocca laroccalaw.com' <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>  
**Subject:** Spurgeon v. Swift Group LCC, et al

Nick,

Please provide the current bank statements for all judgment creditors asap. That should be an easy get for your clients. Also, I need the current contracts we discussed.

Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 12, 2019 2:35 PM  
**To:** Khurram Shah; Jeff LeLeux  
**Subject:** Fwd: Spurgeon v. Swift Group LCC, et al

Sent from my iPhone

Begin forwarded message:

**From:** "jward@wardandcondrey.com" <jward@wardandcondrey.com>  
**Date:** June 12, 2019 at 1:37:52 PM CDT  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
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Telephone: (985) 871-5223

Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

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**From:** Nicholas LaRocca  
**Sent:** Wednesday, June 12, 2019 2:35 PM  
**To:** Khurram Shah; Jeff LeLeux  
**Subject:** Fwd: Spurgeon v. Swift Group LCC, et al

Sent from my iPhone

Begin forwarded message:

**From:** <jward@wardandcondrey.com>  
**Date:** June 6, 2019 at 3:18:46 PM CDT  
**To:** "'nlarocca laroccalaw.com'" <nlarocca@laroccalaw.com>  
**Subject:** Spurgeon v. Swift Group LCC, et al

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Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Wednesday, June 12, 2019 1:38 PM  
**To:** Nicholas LaRocca  
**Subject:** FW: Spurgeon v. Swift Group LCC, et al

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**Sent:** Thursday, June 6, 2019 3:19 PM  
**To:** 'nlarocca\_laroccalaw.com' <nlarocca@laroccalaw.com>  
**Subject:** Spurgeon v. Swift Group LCC, et al

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Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, June 06, 2019 3:19 PM  
**To:** Nicholas LaRocca  
**Subject:** Spurgeon v. Swift Group LCC, et al

Nick,

Please provide the current bank statements for all judgment creditors asap. That should be an easy get for your clients. Also, I need the current contracts we discussed.

Thanks.

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Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com



**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, June 06, 2019 3:15 PM  
**To:** 'Sue Nations'; Nicholas LaRocca  
**Cc:** 'Carol LaNasa'  
**Subject:** RE: Spurgeon v. Swift Group -- 11-cv-01807

Sue,

We are available on July 10, 22 or 24. Dennis will attend assuming his wife's medical condition has stabilized. Presently, he must stay with her. He can attend by phone on June 27 and 28 and I am available to be present on these two dates as well.

Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**From:** Sue Nations <Sue\_Nations@lawd.uscourts.gov>  
**Sent:** Thursday, June 6, 2019 9:40 AM  
**To:** nlarocca\_laroccalaw.com <nlarocca@laroccalaw.com>; jward@wardandcondrey.com  
**Subject:** RE: Spurgeon v. Swift Group -- 11-cv-01807

The following dates are available on Judge Hanna's calendar: June 27, 28 and July 8, 9, 10, 22, 24, and 25. Please let me know if these dates work for you.

Thanks,

Sue

Sue Nations  
Law Clerk to Magistrate Judge Patrick J. Hanna  
United States District Court for the  
Western District of Louisiana  
337-593-5140

**From:** Nicholas LaRocca <[nlarocca@laroccaalaw.com](mailto:nlarocca@laroccaalaw.com)>  
**Sent:** Wednesday, June 05, 2019 5:11 PM  
**To:** Sue Nations <[Sue\\_Nations@lawd.uscourts.gov](mailto:Sue_Nations@lawd.uscourts.gov)>  
**Subject:** RE: Spurgeon v. Swift Group -- 11-cv-01807

I will be attending along with my principals, Jeffrey P. Leleux and Khurram Shah. 10:00 o'clock is fine with me.

**From:** Sue Nations <[Sue\\_Nations@lawd.uscourts.gov](mailto:Sue_Nations@lawd.uscourts.gov)>  
**Sent:** Wednesday, June 05, 2019 4:41 PM  
**To:** [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com); Nicholas LaRocca <[nlarocca@laroccaalaw.com](mailto:nlarocca@laroccaalaw.com)>  
**Subject:** Spurgeon v. Swift Group -- 11-cv-01807

Gentlemen,

Since both of you have expressed a willingness to have Judge Hanna preside over a settlement conference in this matter, please let me know who will be attending the conference with you and the approximate time frame that you would like for us to set the conference. I will then reply with Judge Hanna's available dates. We generally start a settlement conference at 10:00 a.m. and mark off the whole day for you. Once we decide on a mutually agreeable date, Judge Hanna will issue an order formally setting the conference. Please note that Judge Hanna is scheduled to be in trial the week of June 17.

Thank you,

Sue

Sue Nations  
Law Clerk to Magistrate Judge Patrick J. Hanna  
United States District Court for the  
Western District of Louisiana  
337-593-5140

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, June 06, 2019 3:06 PM  
**To:** ssinclair@liskow.com  
**Cc:** 'Carol LaNasa'; Nicholas LaRocca  
**Subject:** FW: Activity in Case 6:11-cv-01807-TAD-PJH Spurgeon v. Swift Group L L C et al Status Conference

Spencer,

See minute entry from Magistrate Hanna. We would like to have Summit attend if they are interested. We are selecting dates now and it appears it will be held in late June or early July.

We did not agree to any forbearance pending the mediation.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**From:** Reply@lawd.uscourts.gov <Reply@lawd.uscourts.gov>  
**Sent:** Thursday, June 6, 2019 11:05 AM  
**To:** Clerk@lawd.uscourts.gov  
**Subject:** Activity in Case 6:11-cv-01807-TAD-PJH Spurgeon v. Swift Group L L C et al Status Conference

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

Western District of Louisiana

## Notice of Electronic Filing

The following transaction was entered on 6/6/2019 at 11:05 AM CDT and filed on 6/5/2019

**Case Name:** Spurgeon v. Swift Group L L C et al

**Case Number:** 6:11-cv-01807-TAD-PJH

**Filer:**

**WARNING: CASE CLOSED on 01/08/2019**

**Document Number:** 217

**Docket Text:**

**MINUTES for proceedings held before Magistrate Judge Patrick J Hanna: TELEPHONE STATUS CONFERENCE held on 6/5/2019. The purpose of the conference was to evaluate the production of documents since the parties' last conference. Counsel also advised that settlement negotiations will recommence shortly. This Court suggested that Summit be encouraged to participate if a settlement conference with this Court is held. Signed by Magistrate Judge Patrick J Hanna on 6/5/2019. (crt,Alexander, E)**

**6:11-cv-01807-TAD-PJH Notice has been electronically mailed to:**

Nicholas F Larocca, Jr [nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)

Joseph R Ward, Jr [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com), [clanasa@wardandcondrey.com](mailto:clanasa@wardandcondrey.com)

**6:11-cv-01807-TAD-PJH Notice will not be electronically mailed to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1045083339 [Date=6/6/2019] [FileNumber=4932560-0]

[9e79035538d0de0dca3353b45616d3505ab0eb25e8c13412e386f1fea380f2257230da4ad2d938cebb7f51537c4d23bcf86128b1e08563767ca72d9568da6962]]

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Wednesday, June 05, 2019 3:02 PM  
**To:** 'Patrick Hanna'; 'Hallie Coreil'; Nicholas LaRocca; 'lawdml\_hanna orders'  
**Subject:** RE: Spurgeon

Judge Hanna,

My client, Dennis Spurgeon, agrees to attend mediation. He asked me to note that he is monitoring a medical condition of his wife and it may be necessary for him to be with her in the next week or so until the condition clears.

Thank you.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**From:** Patrick Hanna <Patrick\_Hanna@lawd.uscourts.gov>  
**Sent:** Wednesday, June 5, 2019 10:49 AM  
**To:** Hallie Coreil <Hallie\_Coreil@lawd.uscourts.gov>; nlarocca\_laroccalaw.com <nlarocca@laroccalaw.com>; lawdml\_hanna orders <hanna\_orders@lawd.uscourts.gov>  
**Cc:** 'jward@wardandcondrey.com' <jward@wardandcondrey.com>  
**Subject:** RE: Spurgeon

I got it Hallie -- it's Spurgeon v. Swift that we had the conference call on this morning

**From:** Hallie Coreil  
**Sent:** Wednesday, June 5, 2019 10:32 AM  
**To:** nlarocca\_laroccalaw.com <nlarocca@laroccalaw.com>; lawdml\_hanna orders <hanna\_orders@lawd.uscourts.gov>  
**Cc:** 'jward@wardandcondrey.com' <jward@wardandcondrey.com>  
**Subject:** RE: Spurgeon

Mr. LaRocca,

Can you please provide a case number?

Thanks,

Hallie

*Hallie P. Coreil  
Law Clerk to Magistrate Judge Patrick J. Hanna  
United States District Court for the  
Western District of Louisiana  
337-593-5141*

**From:** Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>  
**Sent:** Wednesday, June 5, 2019 10:28 AM  
**To:** lawdml\_hanna orders <[hanna\\_orders@lawd.uscourts.gov](mailto:hanna_orders@lawd.uscourts.gov)>  
**Cc:** 'jward@wardandcondrey.com' <[jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)>  
**Subject:** Spurgeon

Dear Judge Hanna:

I have been given authority to represent to you that my clients desire that you assist it the settlement negotiation in this case, by conducting a settlement conference.

Very truly yours,

Nick LaRocca

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Tuesday, June 04, 2019 2:56 PM  
**To:** Khurram Shah (kshah@sunraysint.com); 'Jeff LeLeux'  
**Subject:** Spurgeon Appeal  
**Attachments:** Original Brief on behalf of Appellants.r.pdf

Dear Khurram and Jeff:

Please see the attached original brief filed on your behalf in the U.S. 5<sup>th</sup> Circuit Court of Appeals



**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Tuesday, June 04, 2019 11:36 AM  
**To:** Khurram Shah  
**Subject:** RE: JD Exam Documents

I have - - no problems

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Tuesday, June 04, 2019 10:56 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** Re: JD Exam Documents

Nick,  
I've told you that we don't have infinite resources to produce these documents. Hence, you should inform the counsel that we are doing our best.

Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

This e-mail and any file(s) attached to it may contain confidential and/or privileged information and is intended exclusively for the designated recipient(s). Any other use of this e-mail is prohibited. Sunrays does not represent or warrant that this communication is free of computer viruses or other defects and does not accept liability for any loss or damage caused by this email. If you have received this message in error, please notify the sender immediately by reply email message and delete all copies and attachment

---

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Date:** Tuesday, June 4, 2019 at 11:39 AM  
**To:** Khurram Shah <kshah@sunraysint.com>  
**Subject:** RE: JD Exam Documents

ok

**From:** Khurram Shah <kshah@sunraysint.com>  
**Sent:** Tuesday, June 04, 2019 10:39 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>; 'Jeff LeLeux' <jleleux@swiftships.com>  
**Subject:** Re: JD Exam Documents

We won't be able to produce these until next week

Khurram Shah

Cell: +1 571 431 9572

---

**From:** Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>  
**Sent:** Tuesday, June 4, 2019 10:52 AM  
**To:** Khurram Shah; 'Jeff LeLeux'  
**Subject:** FW: JD Exam Documents

**From:** [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com) <[jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)>  
**Sent:** Tuesday, June 04, 2019 9:22 AM  
**To:** Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>  
**Subject:** JD Exam Documents

Nick,

I don't seem to have the more recent contracts we asked for. Also, and most importantly, I need the current (2019) bank statements from all judgment debtors.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
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**Nicholas LaRocca**

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Kind Regards,

**Khurram Shah**  
President/CEO



Cell: 571-431-9572  
Fax: 703-356-1166

This e-mail and any file(s) attached to it may contain confidential and/or privileged information and is intended exclusively for the designated recipient(s). Any other use of this e-mail is prohibited. Sunrays does not represent or warrant that this communication is free of computer viruses or other defects and does not accept liability for any loss or damage caused by this email. If you have received this message in error, please notify the sender immediately by reply email message and delete all copies and attachment

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To: Khurram Shah; 'Jeff LeLeux'

Subject: FW: JD Exam Documents

From: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com) <[jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)>

Sent: Tuesday, June 04, 2019 9:22 AM

To: Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)>

Subject: JD Exam Documents

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Ward & Condrey

438 S. New Hampshire Street

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Telephone: (985) 871-5223

Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

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**Nicholas LaRocca**

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**Subject:** JD Exam Documents

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438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

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**From:** Nicholas LaRocca  
**Sent:** Tuesday, June 04, 2019 9:53 AM  
**To:** Khurram Shah (kshah@sunraysint.com); 'Jeff LeLeux'  
**Subject:** FW: JD Exam Documents

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**Sent:** Tuesday, June 04, 2019 9:22 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** JD Exam Documents

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Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Monday, June 03, 2019 4:39 PM  
**To:** 'jward@wardandcondrey.com'  
**Subject:** Spurgeon  
**Attachments:** FY2014\_ICS Nett\_ M&T-1682.pdf; FY2014\_ICS Nett\_M&T-1721.pdf; FY2015\_ICS Nett\_ M&T-1682.pdf; FY2016\_ICS Nett\_ M&T-1682.pdf

Here are the ICS Nett, Inc. banking records.



**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Monday, June 03, 2019 4:37 PM  
**To:** 'jward@wardandcondrey.com'  
**Subject:** Spurgeon  
**Attachments:** 2014 - FNBC - Swiftships LLC - Account #110083428 - Operating.pdf; 2014 - FNBC - Swiftships LLC - Account #110083439 - Payroll.pdf; 2015 - FNBC - Swiftships LLC - Account #110083428 - Operating.pdf; 2015 - FNBC - Swiftships LLC - Account #110083428 - Operating.pdf

Here are the FNBC bank docs.

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Monday, June 03, 2019 4:32 PM  
**To:** '(Joe) Joseph Ward Jr.'  
**Subject:** Spurgeon  
**Attachments:** Shehrazee Personal tax Return -2014.pdf; Shehrazee Personal tax Return -2015.pdf

Income tax records for Shehrazee Shah

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Friday, May 31, 2019 3:04 PM  
**To:** Joseph Ward  
**Subject:** Re: Contracts

Okay

Sent from my iPhone

On May 31, 2019, at 2:19 PM, Joseph Ward <[jrwardjr@gmail.com](mailto:jrwardjr@gmail.com)> wrote:

Nick,

The contracts you provided to day are old contracts. I need the current contracts including any landing craft contracts.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, May 31, 2019 2:19 PM  
**To:** Nicholas LaRocca; Maria G. Izaguirre  
**Subject:** Contracts

Nick,

The contracts you provided to day are old contracts. I need the current contracts including any landing craft contracts.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, May 31, 2019 9:47 AM  
**To:** Nicholas LaRocca  
**Subject:** Re: Spurgeon

Thanks Nick. Please send future docs to my office email address [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com).

Thanks.

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

On May 31, 2019, at 9:39 AM, Nicholas LaRocca <[nlarocca@laroccalaw.com](mailto:nlarocca@laroccalaw.com)> wrote:

Joe: Here are all corporate docs supporting ownership of the various companies.

<Corporate Docs\_Swiftships Group, Inc..pdf>

<Corporate Docs\_Swiftships Shipbuilders, L.L.C..pdf>

<Articles of Incorporation\_ICS Nett, Inc..pdf>

<Corporate Docs\_Swift Group, LLC.pdf>

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Friday, May 31, 2019 9:16 AM  
**To:** Joseph Ward  
**Subject:** RE: Spurgeon

Getting them to you as fast as I can

**From:** Joseph Ward <jrwardjr@gmail.com>  
**Sent:** Friday, May 31, 2019 9:15 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** Re: Spurgeon

Thanks Nick.

I really need the bank statements as I intend to commence garnishments.

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire St.  
Covington, LA 70433  
Telephone: 985-871-5223 [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

On May 31, 2019, at 9:12 AM, Nicholas LaRocca <nlarocca@laroccalaw.com> wrote:

Joe: Here is a list of assets of the late Calvin Leleux which was only signed yesterday. I am attempting to secure a list of personal assets from Shehraz and will get it to you asap

<Sworn Detailed Descriptive List of Assets\_signed.pdf>

**Nicholas LaRocca**

---

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**Sent:** Friday, May 31, 2019 9:15 AM  
**To:** Nicholas LaRocca  
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<Sworn Detailed Descriptive List of Assets\_signed.pdf>

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, May 30, 2019 2:02 PM  
**To:** Nicholas LaRocca  
**Subject:** JD Exam Document Production

Nick,

The settlement agreement in Taj was not attached to your earlier email.

To request no. 1, I have only received the redacted SBE Audit recently prepared, no other prior financial statement have been provided. And the audit doesn't include any assets owned by S. Shah or C. LeLeux.

To request no. 2, I have only received tax returns for S. Shah and only the first 2 pages of the returns.

To Request no. 3, I have received only bank statements for Swiftships LLC – no other debtor.

To request no. 4, I have only received the ICS Nett balance sheets and the SBE Audit recently prepared.

To request no. 5, I have received nothing,

To request no. 6, I have received no documentation establishing ownership of assets. I do have documentation form discovery showing ownership of Swiftships Group, Inc. And I assume the judgement debtors own additional assets.

To request no. 9, I don't have the documents granting any lien or mortgage. I do have the forbearance agreement with Summit that lists the documents.

To request no. 11, I have no documents or response.

To request no. 12, as indicated above, the Taj settlement was not attached to your earlier email.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey



438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, May 30, 2019 11:12 AM  
**To:** Nicholas LaRocca  
**Subject:** RE: Spurgeon v. Swift Group. LLC, et al

Spencer is discussing with Summit. Will get back to me. I advised him I would be filing a suit for a dec. action to void their lien position.

I guess your clients decided not to produce anything further on the JD Exam document request?

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Thursday, May 30, 2019 11:07 AM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Spurgeon v. Swift Group. LLC, et al

Thank you. Are you any closer to evaluating your chance of recovering anything behind Sumitt?

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Thursday, May 30, 2019 9:40 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** Spurgeon v. Swift Group. LLC, et al

Nick,

Attached please find a copy of Appellee's Brief which we have filed.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

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**Sent:** Thursday, May 30, 2019 11:07 AM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Spurgeon v. Swift Group. LLC, et al

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**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Thursday, May 30, 2019 9:40 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** Spurgeon v. Swift Group. LLC, et al

Nick,

Attached please find a copy of Appellee's Brief which we have filed.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Thursday, May 30, 2019 9:40 AM  
**To:** Nicholas LaRocca  
**Cc:** 'Carol LaNasa'  
**Subject:** Spurgeon v. Swift Group, LLC, et al  
**Attachments:** Appelle Brief-as filed.pdf

Nick,

Attached please find a copy of Appellee's Brief which we have filed.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, May 29, 2019 1:51 PM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Spurgeon

Spencer Sinclair, Esq.  
Liskow & Lewis  
One Shell Square  
701 Poydras Street, Suite 5000  
New Orleans, Louisiana 70139

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Wednesday, May 29, 2019 12:53 PM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** Spurgeon

Nick,

Could you provide the name of the attorney representing Summit again. I misplaced it.

Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

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**Sent:** Wednesday, May 29, 2019 12:53 PM  
**To:** Nicholas LaRocca  
**Subject:** Spurgeon

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Thanks.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Wednesday, May 15, 2019 12:55 PM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Status Conference regarding JD Exam  
**Attachments:** 06.06.2018 Forbearance Agreement (Fully Ececuted)\_LAR.pdf; SBE Group of Companies - Combined Financial Statements as of Dec 31 2018 (002)\_Redacted.pdf

Joe: Here are some other documents in response to the order, the financial statements of all the business and a forbearance agreement with Summit

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Tuesday, May 14, 2019 11:33 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** Status Conference regarding JD Exam

Nick,

In preparation for our status conference tomorrow, I attach a copy of the production order with my notes in red indicating what I have received. Note that 90% of the requested documents have not been produced.

1. I have no financial statements from any debtor.
2. I have income tax returns only from Shehrazee and only the 1040 without any supporting schedules. No returns for any other debtor
3. Only bank statements from Swiftships LLC from 7/1/16 to 12/29/18. None from any other debtor.
4. Income statement and balance sheet from ICS Nett for 2018 only. None for any other debtor.
5. No response to request no. 5 from any debtor.
6. No response to request no. 6 from any debtor.
7. No response to request no. 7 from any debtor.
8. No response to request no. 8 from any debtor.
9. No response to request no. 9 from any debtor.
10. No response to request no. 10 from any debtor.
11. No response to request no. 11 from any debtor.
12. No response to request no. 12 from any debtor.

Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)



**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Tuesday, May 14, 2019 12:13 PM  
**To:** 'Jeff LeLeux'; Khurram Shah (kshah@sunraysint.com)  
**Subject:** FW: Status Conference regarding JD Exam  
**Attachments:** Order on JD Exam signed 4.22.19.docreceiptsf4.22.19.1.pdf

Dear Jeff and Khurram:

Please consider the email below and advise me what other documents we have retrieved in response to the order of the court. Please also be advised that the order specifically lists any forbearance agreements with our lender. Since we have possession of that document, it is essential that it be turned over to plaintiff. Otherwise you may be (will be) found in contempt and the court will consider your behavior to be in bad faith and fraudulent.

I know Khurram does not wish to turn over the forbearance agreement, but the risk is too great. Please give me your permission to forward the agreement to counsel before tomorrow's conference with the court.

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Tuesday, May 14, 2019 11:33 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** Status Conference regarding JD Exam

Nick,

In preparation for our status conference tomorrow, I attach a copy of the production order with my notes in red indicating what I have received. Note that 90% of the requested documents have not been produced.

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3. Only bank statements from Swiftships LLC from 7/1/16 to 12/29/18. None from any other debtor.
4. Income statement and balance sheet from ICS Nett for 2018 only. None for any other debtor.
5. No response to request no. 5 from any debtor.
6. No response to request no. 6 from any debtor.
7. No response to request no. 7 from any debtor.
8. No response to request no. 8 from any debtor.
9. No response to request no. 9 from any debtor.
10. No response to request no. 10 from any debtor.

11.No response to request no. 11 from any debtor.

12.No response to request no. 12 from any debtor.

Joe

Joseph R. Ward, Jr.

Ward & Condrey

438 S. New Hampshire Street

Covington, LA 70433

Telephone: (985) 871-5223

Email: [jward@wardandcondrey.com](mailto:jward@wardandcondrey.com)

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Tuesday, May 14, 2019 11:33 AM  
**To:** Nicholas LaRocca  
**Cc:** 'Carol LaNasa'  
**Subject:** Status Conference regarding JD Exam  
**Attachments:** Order on JD Exam signed 4.22.19.docreceiptsf4.22.19.1.pdf

Nick,

In preparation for our status conference tomorrow, I attach a copy of the production order with my notes in red indicating what I have received. Note that 90% of the requested documents have not been produced.

1. I have no financial statements from any debtor.
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4. Income statement and balance sheet from ICS Nett for 2018 only. None for any other debtor.
5. No response to request no. 5 from any debtor.
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7. No response to request no. 7 from any debtor.
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Joe

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Monday, April 22, 2019 10:19 AM  
**To:** Nicholas LaRocca  
**Subject:** RE: Spurgeon v. Swiftships

Got it. Thanks.

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Monday, April 22, 2019 9:44 AM  
**To:** 'jward@wardandcondrey.com' <jward@wardandcondrey.com>  
**Subject:** Spurgeon v. Swiftships

Joe: Many of the documents you requested are in drop box under the folder name Swiftships Spurgeon jd rule. I have shared the files with you.

**Nicholas LaRocca**

---

**From:** Nicholas LaRocca  
**Sent:** Monday, April 22, 2019 9:44 AM  
**To:** 'jward@wardandcondrey.com'  
**Subject:** Spurgeon v. Swiftships

Joe: Many of the documents you requested are in drop box under the folder name Swiftships Spurgeon jd rule. I have shared the files with you.

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Tuesday, April 09, 2019 12:11 PM  
**To:** Nicholas LaRocca  
**Cc:** 'Carol LaNasa'  
**Subject:** Spurgeon  
**Attachments:** PROPOSED ORDER (JD Exam).pdf

Nick,

I filed the wrong proposed order. Here's the right one.

Joseph R. Ward, Jr.  
Ward & Condrey  
438 S. New Hampshire Street  
Covington, LA 70433  
Telephone: (985) 871-5223  
Email: jward@wardandcondrey.com

**Nicholas LaRocca**

---

**From:** jward@wardandcondrey.com  
**Sent:** Tuesday, April 09, 2019 11:40 AM  
**To:** Nicholas LaRocca  
**Subject:** RE: Order on JD Exam

Ok, I'll make that change but would request you send what you can asap. I'd like to start reviewing some docs before I leave on April 25. Thanks.

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Tuesday, April 9, 2019 11:16 AM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Order on JD Exam

30 days, subject to extension for good cause demonstrated to the court?

Summit's counsel is Spencer Sinclair, at Liskow an Lewis

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Tuesday, April 09, 2019 10:49 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Subject:** RE: Order on JD Exam

Ok. What time frame do you suggest? We have a status conference on May 15. I'll be out of town from April 25 thru May 10. Would like to review as much as I can before the conference.

Also, can you give me the name of the Summit attorney?

**From:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Sent:** Tuesday, April 9, 2019 10:28 AM  
**To:** jward@wardandcondrey.com  
**Subject:** RE: Order on JD Exam

Joe: I do not object to the priorities, subject matter, or document catlagories. However, the court indicated that the order should be filed within 10 days of the hearing - - your order states that compliance is due 10 days following the order. I think we both agree that that is not a realistic time frame.

**From:** jward@wardandcondrey.com <jward@wardandcondrey.com>  
**Sent:** Tuesday, April 09, 2019 10:01 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
**Subject:** Order on JD Exam

Nick,

See attached Motion for Entry of Order and Order which I plan to file. Please indicate whether you have an objection or no objection so I can note it in the motion.

Thanks.

Joe

Joseph R. Ward, Jr.  
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**Nicholas LaRocca**

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**Nicholas LaRocca**

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**Sent:** Tuesday, April 09, 2019 10:01 AM  
**To:** Nicholas LaRocca <nlarocca@laroccalaw.com>  
**Cc:** 'Carol LaNasa' <clanasa@wardandcondrey.com>  
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**Nicholas LaRocca**

---

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**Sent:** Tuesday, April 09, 2019 10:01 AM  
**To:** Nicholas LaRocca  
**Cc:** 'Carol LaNasa'  
**Subject:** Order on JD Exam  
**Attachments:** MOTION (JD Exam).doc; PROPOSED ORDER (JD Exam).doc

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